

Cardoso, Rebecca D CIV NAVFAC HQ, BRAC PMO

From: Sullivan, James B CIV NAVFACHQ, BRAC PMO
Sent: Tuesday, October 9, 2012 8:56 AM
To: Hill, John M CIV NAVFACHQ, BRAC PMO; Theroux, Debra M CIV NAVFACHQ, BRAC PMO; Norman, Marvin D CIV WEST Counsel; Forman, Keith S CIV NAVFACHQ, BRAC PMO
Cc: Clark, David J CIV NAVFAC SW
Subject: FW: TIDA / TCDA Comments on Draft Historical Radiological Assessment - Supplemental Technical Memorandum
Attachments: STM_review_REB_final.pdf

Here are TIDA's comments (in the body of the e-mail and the attachment), with TICA's comments added by TIDA to the bottom of their e-mail.

Dave will forward these to RASO.

v/r, Jim

-----Original Message-----

From: Warner, Scott [mailto:Scott.Warner@amec.com]

Sent: Friday, October 05, 2012 14:21

To: Sullivan, James B CIV NAVFACHQ, BRAC PMO; Clark, David J CIV NAVFAC SW; Konzen, Anthony CTR NAVFACHQ, BRAC PMO

Cc: William Carson; Michael.Tymoff@sfgov.org; Kate.Austin@sfgov.org; reburns@ngtsinc.com; Janda, Danielle L CIV NAVFAC SW; O'Sullivan, Jessica; David Stensby (stensby.david@epa.gov); denise.tsuji@dtsc.ca.gov;

Myriam.Zech@waterboards.ca.gov; Sunga, Remedios@DTSC; Bibbins, George; Jones, Carolyn

Subject: TIDA / TCDA Comments on Draft Historical Radiological Assessment - Supplemental Technical Memorandum

Dear Jim.

On behalf of the Treasure Island Development Authority (TIDA), AMEC Environment & Infrastructure (AMEC) has reviewed the Draft Historical Radiological Assessment - Supplemental Technical Memorandum (HRASTM), Naval Station Treasure Island, San Francisco, California, dated August 6, 2012. Our comments on the draft document are provided below. We also are including comments provided by Terraphase Engineering on behalf of Treasure Island Community Development, LLC (TICD) as indicated below.

TIDA and AMEC have relied on our subcontractor, Mr. Bob Burns, Certified Health Physicist with NGTS, Inc., to provide a technical review of the document. Mr. Burns, has reviewed radiological items on behalf of TIDA at Treasure Island for many years and is very familiar with the project activities at Treasure Island. Mr. Burns comment letter on the HRASTM is attached to this transmission.

First, please note that TIDA is committed to doing all it can to assure residents and workers that TI is and will remain safe with regard to the cleanup of environmental contaminants on TI. We will continue to request that a thorough and

comprehensive environmental evaluation of TI be performed by the US Navy and its subcontractors, and that all construction related activities are performed to the standard of care necessary to protect human health and the environment. We appreciate the Navy's willingness to work with us as the cleanup activities at TI continue.

Our general comments are as follows:

1. We believe that the introduction to the document (starting in Section 1.0) should be strengthened to better indicate the rationale for commencing with the research that lead to the HRASTM. We also request that the introduction be strengthened to better indicate how the conclusions reached by the HRASTM integrate with those reached by the 2006 HRA. Please clarify what parts of the 2006 HRA are now obsolete, and which parts are specifically supplemented by the HRASTM. Please provide an overall "roadmap" showing the integration of the information, if appropriate.
2. We also request that the definition of "impacted" and "non-impacted" sites be provided in the opening paragraph of the document. Please consider both the technical and non-technical reader in providing this definition.
3. It appears that key drivers to the reasoning for preparing the HRASTM do not appear until late in the document. For example, Section 5.2 refers to preparing Conceptual Site Models (CSM) as a major advantage of this HRASTM. We believe this to be important and this objective should be presented early in the introduction to the document. Another important item that should be presented much earlier is the information in Section 2.3 on the summary of the 2006 HRA (which currently appears on Page 26 of the HRASTM).
4. While a full listing of references is provided in the accompanying Compact Disc (CD) of information, could a table be provided that better indicates what documents in the Reference CD was used to support the various bullets of information provided on Pages 1 and 2 of Section 1.2.
5. Please define, or consider, replacing the word "significant" within the document, unless this term is being used for specific quantification of a value (such as "statistically significant"). For example, what does "significant" ship repair refer to (in Section 1.2, Page 2) compared to what "insignificant" ship repair activities might refer to.
6. The final section of the HRASTM (6.2) indicates that all areas subject to the prior HRA and this HRASTM are suitable for transfer with respect to impacts on human health and the environment. However, the HRASTM indicates substantial differences from the HRA, and questions remain regarding the potential for discrete sources or localized contamination, unknown piping, former facilities that could have been impacted where deconstruction material may have found its way to other parts of TI. We suggest that this section provide an area by area summary table to better evaluate the potential issues, including uncertainties that will affect the transferability of areas on the island.

General Comments

The document is meant to be a living document, however two known radiological issues are not discussed in the document and it seems pertinent to discuss them in this draft rather than releasing another draft almost immediately upon finalization of this version. The specific issues are:

- . Radiological detections found beneath the sewer lines for Building 233.
- . Potential impacts to utilities for Building 3.

Specific Comments

- . Section 1.2, Bulleted list at top of Page 2: Should the SWDA NTCRA and Building 233 activities be added to this list? If not, why were these activities/results not reviewed?
- . Section 1.2, First bullet at the bottom of Page 2: Please change the sentence in the middle of the text to read: "While it is unclear precisely when these ship repair activities ceased, they were significantly reduced immediately following WW II."
- . Section 2.2.1, Fourth paragraph: How do we know there are not other utility lines for Building 3?
- . Section 2.2.2, Last paragraph: This section discusses B233. Should the utility lines for B233 also be discussed in this section?
- . Section 2.2.6, Last paragraph: This section discusses AOI 6. However, the end of this paragraph discusses the further investigation activities that are required in Site 12 which is in AOI 7. It may help a reader if this discussion is moved to the next section where activities in AOI 7 are discussed.
- . Section 2.2.7, Page 22, Second bullet: Please clarify if the excavations conducted in the former storage yard were backfilled to grade or if they were left at an elevation below grade.
- . Section 2.2.7, Photo 23: Additional explanation for the shading shown on the photograph is needed. What areas are considered radiologically impacted and what are not?
- . Section 6.2: This section states that the FOST areas are suitable for transfer, except for those areas identified in the HRA and the HRASTM as radiologically impacted. However, this HRASTM does not discuss the impacts to the B233 utilities and the potential impacts to the Building 3 utilities. Please clarify how these areas are/will be delineated and the appropriateness of the transfer of these areas under the FOST.

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Principal and Global Practice Area Leader/Environmental Remediation AMEC Environment & Infrastructure

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